Q. (Reference 3.1 - Transmission Line 100L Rebuild)
a) What lessons learned from the transmission line 55L Rebuild and 94L Rebuild projects have been applied to 100L?
b) Have NP staff walked line 100L?
c) Has NP discussed required approvals with entities relevant to the approval process for Line 100L Rebuild?

A. a) Newfoundland Power has applied lessons learned from the Transmission Line 55L and 94L Rebuild projects to the development of the Transmission Line 100L Rebuild project.

For example, the alternative proposed by Newfoundland Power for the Transmission Line 100L Rebuild project involves rerouting a section of the transmission line to parallel the Trans-Canda Highway as opposed to following the existing right-of-way of the line. The re-routing of this section of the line was considered as a direct result of the difficult site conditions and associated costs experienced on the Transmission Line 94L Rebuild project. As discussed in report *3.2 – Transmission Line 94L Rebuild* from Newfoundland Power's *2025 Capital Budget Application*, the Company experienced higher than anticipated costs on the project due to extreme wetland and bog conditions along the planned right-of-way. When developing alternatives for the Transmission Line 100L Rebuild project, a portion of the existing line was found to be in an area with poor terrain conditions similar to those found on the Transmission Line 94L project. As a result, Newfoundland Power proposed an alternative which re-routed the line to avoid this area and the higher costs associated with constructing a transmission line through these difficult site conditions.

Additionally, as another learning from the Transmission Line 55L and 94L Rebuild projects, Newfoundland Power has moved to a new project execution approach for its multi-year *Transmission Line Rebuild* projects. The previous approach was to complete all project work on individual segments of line in their entirety in each year of a project. The new approach involves the completion of the entire detailed line design, procurement, and vegetation right-of-way clearing in the first year of the project, with line construction starting in the second year. [1] This change provides additional time to secure environmental approvals and permits in the first year of the project without affecting construction timelines. This execution methodology has been applied to the planned Transmission Line 100L Rebuild project.

b) Yes, Newfoundland Power staff have travelled the line on foot and with the use of off-road vehicles.

c) Yes, Newfoundland Power has discussed required approvals with entities relevant to the approval process for the Transmission Line 100L Rebuild project.

[1] For example, the previous approach on a 40km transmission line would involve rebuilding 20km in Year 1 and 20km in Year 2. The new approach focuses on completing design, procurement and vegetation work in Year 1, with construction on the entire 40km line occurring in Year 2.

During the execution of projects under the Company's *Transmission Line Rebuild Strategy*, Newfoundland Power is usually required to submit projects for an Environmental Assessment ("EA").[2] As such, the Company regularly interfaces with the EA Division of the provincial Department of Environment and Climate Change and the referral agencies reviewing projects undergoing assessment. As it is routinely involved in the EA process, Newfoundland Power has become familiar with the typical permits and approvals required by the EA's approval conditions. These include items such as permits to ford water bodies, permits to work in Protected Public Water Supply Areas, and requirements around migratory birds and other species at risk. These regulatory requirements have been included in the project planning and budgeting process for this project.

Newfoundland Power also discussed this project with the provincial Department of Transportation and Infrastructure to ensure the proposed re-routing of the transmission line to follow the Trans-Canada Highway will not interfere with any current or future projects planned by that department.

[2] Specific triggers in provincial legislation dictate when a project requires an environmental assessment. These triggers include the construction of a new transmission line located more than 500 metres from an existing right-of-way and any undertaking that will occur within 200 metres of a scheduled salmon river.